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## **EXHIBIT A**

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**NOTICE OF MOTION AND MOTION TO COMPEL DEFENDANT WILLIAM K. SPENCER'S INITIAL  
DISCLOSURES PURSUANT TO FED. RULE CIV. PROC., RULE 26; REQUEST FOR MONETARY  
SANCTIONS IN THE AMOUNT OF \$1,365.00.00 AGAINST DEFENDANT WILLIAM K. SPENCER**



Richard Uss <[richard@nussbaumapc.com](mailto:richard@nussbaumapc.com)>

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## Gwen Nolan v. William K. Spencer

1 message

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**[richard@nussbaumapc.com](mailto:richard@nussbaumapc.com)** <[richard@nussbaumapc.com](mailto:richard@nussbaumapc.com)>

Thu, Jan 14, 2021 at 1:33 PM

Reply-To: [richard@nussbaumapc.com](mailto:richard@nussbaumapc.com)

To: [wksarch@gmail.com](mailto:wksarch@gmail.com)

Good Afternoon Mr. Spencer,

Previously, our firm has attempted to obtain your Rule 26 disclosures to no avail. The Federal Rules of Civil Procedure require that you provide such disclosures and, as you are aware, at the previous status conference on October 6, 2020, the court raised the issue of your lack of compliance with respect to Rule 26. Plaintiff is entitled to these disclosures as a matter of law and, if same are not received by the close of business on Monday, January 18, 2021, we will move the court to compel compliance along with the appropriate monetary sanctions.

I look forward to the receipt of your disclosures by January 18, 2020.

Thank you.

Sincerely, Richard J. Uss, Esq. Attorney Nussbaum APC 27489 Agoura Road Suite 102 Agoura Hills, California 91301  
Email: [Richard@nussbaumapc.com](mailto:Richard@nussbaumapc.com) Telephone: 818-660-1919 Facsimile: 818-864-3241 CONFIDENTIALITY  
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